



Peace Officers Research Association of California

August 16, 2010

The Honorable Commissioner Clyburn
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

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Federal Communications Commission
Bureau / Office

**Re: Public Safety Use of the 700 MHz D Block Spectrum
PS Docket No. 06-229**

Dear Commissioner Clyburn:

The Peace Officers Research Association of California (PORAC) supports the Federal Communications Commission's (FCC) recommendation in the National Broadband Plan to create an interoperable nationwide public safety network. PORAC is the largest state association of public safety officers in the country, representing 62,000 members throughout California. PORAC supports the proposal to auction the 700 MHz D block, to use auction proceeds to fund construction of a viable public safety network, and to require interoperability across the entire 700 MHz band.

The FCC's proposal will help ensure public safety has sufficient wireless broadband capacity, providing speedy, resilient, hardened, affordable and frankly overdue communications capabilities. By auctioning the D block, the FCC plan provides PORAC members with a truly competitive choice, which will improve pricing, service, equipment and availability.

PORAC particularly supports the FCC's recommendation to provide a funding mechanism for a public safety network. Investing proceeds from the D block auction is the most efficient, practical and reliable way to fund construction of a next-generation public safety network, especially in rural inland California. The FCC's plan provides at least \$12 billion in grants for states and localities to construct and operate wireless broadband for public safety.

Lastly, ensuring interoperability throughout the entire paired 700 MHz spectrum is critical to public safety. Interoperability facilitates seamless roaming across all compatible networks, increases capacity during an emergency, and provides economies of scale to drive down equipment costs. Utilizing commercial technologies will enable public safety agencies to achieve greater interoperability at much lower costs.

For these reasons, PORAC supports the FCC's 700 MHz D Block plan. The FCC's plan finally will provide public safety with improved communications capabilities to help protect our communities and save lives.

Sincerely,

A handwritten signature in black ink that reads "Ron Cottingham".

Ron Cottingham
President, PORAC